## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE

UNITED STATES OF AMERICA	)
V.	) ) NO. 3:22-CR-00327
CHESTER GALLAGHER; HEATHER IDONI; CALVIN ZASTROW; COLEMAN BOYD;	) JUDGE TRAUGER
PAUL VAUGHN; DENNIS GREEN	) )
	)

### MOTION TO PARTIALLY SEAL DOE WITNESS DECLARATIONS

Pursuant to Local Rule 5.03(a), Jane Doe Witness 1, Jane Doe Witness 2, and Jane Doe Witness 3 (collectively, "Doe Witnesses"), by and through undersigned counsel, respectfully moves this Court for leave to file the Doe Witnesses' Declarations (the "Doe Declarations") partially under seal. As set in the accompanying Memorandum of Law and supporting exhibits filed contemporaneously herewith, the partial sealing of the Doe Declarations is narrowly tailored to overcome the presumption of public access, and is warranted to protect the Doe Witnesses' privacy and safety as third-parties to these proceedings.

Based on the foregoing, as well as on facts and argument set forth in the accompanying Memorandum of Law and supporting exhibits filed contemporaneously herewith, Doe Witnesses respectfully move that the Court (i) grant this Motion to Partially Seal the Doe Witness Declarations, and (ii) direct the clerk to publicly file the redacted version of the Doe Witness Declarations, to include the redactions submitted in Exhibits A, B and C to the Memorandum in Support of this Motion.

Dated: January 9, 2024

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#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing will be served this 9th day of January, 2024 by operation of the Court's CM/ECF system on the following:

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